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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

**UNITED STATES OF AMERICA
CHESS FEDERATION, INC., *et al*,**

Plaintiffs,
v.

SUSAN POLGAR, *et al*,

Defendants.

Case No. 3:08-CV-05126-MHP

**DECLARATION OF BILL HALL IN
SUPPORT OF ANTI-SLAPP MOTION**

1 I, Bill Hall, declare as follows:

2
 3 1. I serve as the Executive Director of the United States of America Chess
 4 Federation, Inc. ("USCF"), a party to this action. I also serve as the corporate secretary
 5 for the USCF. Unless otherwise stated, I have personal knowledge of the facts stated
 6 herein.

7 2. Randall Hough did not run for reelection to the Executive Board, and
 8 accordingly his term ended on August 9, 2009. The Board of Delegates ratified all
 9 conduct by the Executive Board during Randall Hough's tenure.

10 3. The allegation in Polgar's counterclaims that, "[Counter-Defendants] filed
 11 the suit against doe defendants only despite their intent, all along, to amend the lawsuit
 12 to name Ms. Polgar as a defendant," is false. Neither I, nor the USCF, nor any of the
 13 counter-defendants or third party defendants, had any intent to name Polgar at the time
 14 this lawsuit was filed. After the USCF conducted discovery, which was obviously after
 15 the filing of the lawsuit, the USCF discovered that Gregory Alexander was responsible
 16 for gaining unauthorized access to Randall Hough's email account. This was new
 17 information that was gained after the filing of the doe lawsuit.

18 4. Neither the USCF, nor any of the counter-defendants or third party
 19 defendants in this action, ever actually obtained information from American Express
 20 pursuant to subpoenas issued in this case. There was a subpoena issued to American
 21 Express in the Texas litigation by the USCF, to which American Express has responded.

22 5. The salaries of employees of Texas Tech University are published by the
 23 university for public review. Thus, Texas Tech University has published the following:
 24 TRUONG, HOAINHAN MINH \$75,000.00 UNIT ASSOCIATE DIRECTOR, as published
 25 by, among other publishers, a media outlet in Lubbock, Texas
 26 (<http://newsradio1420.com/public/ttuSalaryList2008.html>; see also, <http://cid-86b79dba52fa4b4e.skydrive.live.com/self.aspx/Public%20Record/Texas%20Tech%20campus%20employees%20payscales.XLS>).
 27 Moreover, according to Texas Tech
 28

1 University's Office of Communications, Truong's start date as June 1, 2007. See,
2 http://www.lubbockonline.com/stories/031109/loc_407742251.shtml.

3
4 I declare under penalty of perjury under the laws of the United States of America
5 that the foregoing is true and correct and that this Declaration was executed on August
6 24, 2009, in Crossville, Tennessee.

7 s/Bill Hall
8 Bill Hall
9 Secretary of USCF

10 **ATTESTATION OF CONCURRENCE IN FILING**

11 Pursuant to the General Order No. 45, section 45 X(B), for The United States
12 District Court for the Northern District of California, I, Karl S. Kronenberger, hereby attest
13 that the concurrence to the filing of this DECLARATION OF BILL HALL IN SUPPORT
14 OF ANTI-SLAPP MOTION has been obtained from Bill Hall who has provided the
15 conformed signature above.
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